

Appendix 4

Initial Environmental Examination

TITLE II ENVIRONMENTAL COMPLIANCE FACE SHEET

Title of MYAP: Community Action, Nutrition, and Livelihoods (CANAL)
CS Name/Country/Region: Counterpart International, Mauritania, West Africa
Funding Period: 2007-2011

Resource Levels: Commodities (dollar equivalent, incl. monetization): \$12,392,430
Total metric tonnage request: 53795MT
202(e) grant: \$827,065

Statement Prepared by: Ahmadou NDiade, Program Manager

IEE Amendment? No **Date of Original IEE** May, 14th, 2006

Environmental Media and/or Human Health Potentially Impacted:

air___ water X land X biodiversity___ human health X other___ none___

Environmental Action(s) Recommended:

X 1. *Categorical Exclusions*

X 2. Initial Environmental Examination:

- X *Negative Determination:* no significant adverse effects expected regarding the proposed activities, which are well defined over life of MYAP. IEE prepared:
- X without conditions (no special mitigation measures needed; normal good practices and engineering will be used).
- X with conditions (special mitigation measures specified to prevent unintended impact).
- ___ *Negative Determination:* no significant adverse effects expected, but multiple sites and sub-activities not yet fully defined or designed. Umbrella IEE prepared.
- ___ Conditions agreed to regarding an appropriate process of environmental capacity building and screening, mitigation and monitoring.
- ___ *Positive Determination:* IEE confirms potential for significant adverse effect of one or more activities. Appropriate environmental review needed/conducted.
- ___ EA to be/being/has been conducted. Note that the activities affected cannot go forward until the EA is approved
- ___ X *Deferral:* one or more elements not yet sufficiently defined to perform environmental analysis; activities will not be implemented until amended IEE is approved.

Summary of Findings:

USAID APPROVAL OF ENVIRONMENTAL ACTION(S) RECOMMENDED:

Clearance:

Mission/West Africa Director: _____ Date: _____

Food for Peace Director: _____ Date: _____
William Hammink

Concurrence:

Bureau Environmental Officer (DCHA): _____ Date: _____
Carl Gallegos

Approved: _____ Disapproved: _____

Optional Clearances:

FFP Officer: _____ Date: _____
Carolyn Hughes

Regional Environmental Officer: _____ Date: _____
Rob Clausen

Summary Findings

Based on environmental review procedures, the following environmental determinations are recommended:

1. A **Categorical Exclusion** is recommended for all training activities under 22 CFR 216.2(c)(2)(i), for which no further screening and review shall be necessary. The training are of classroom type and do not involve any chemicals or products that might have a negative impact on the environment. Therefore the activity shall be categorically excluded from further environmental review.

2. A **Negative Determination with Conditions** is recommended for the food distribution component. This activity may use fumigant gas and other pesticides for the preservation of the commodities. The condition, therefore, is that a PERSUAP (Pesticide Use Report and Safe Action Plan) be prepared and approved before this activity is initiated.

3. A **Categorical Exclusion** is recommended for all the activities related to the supply of equipment to health units, Traditional Birth Attendants (TBAs), and Community Health Workers (CHW) under 22 CFR 216.2(c)(2)(i), for which no further screening and review shall be necessary. This equipment is standard and its operation does not produce any negative impact on the environment. Therefore the activity shall be categorically excluded from further environmental review.

6. A **Deferral** is requested for activities that will be identified by the communities and that might have a negative impact on the environment. In the case of such an eventuality, CPI will work with the communities to identify and implement mitigation measures for these activities. CPI will also submit an IEE-Amendment if these activities are of a significant impact or scale. It is expected that these activities will be of a small scale and CPI will use recommended mitigation measures contained in **Guidelines for Small Scale Activities in Africa**.

List of potential activities for deferral.

- Reforestation Activities
- Well digging Activities
- Pesticide-free Vegetable Gardening Activities
- Latrine Rehabilitation or Improvement Activities
- Waste Collection Activities
- Animal Fattening Activities
- Infrastructure Rehabilitation Activities (e.g. Health Infrastructures)
- Health IEC campaigns

Initial Environmental Examination

1.0 BACKGROUND AND ACTIVITY DESCRIPTION

1.1 Background

The Islamic Republic of FFP-A-00-07-00002

routinely faces widespread food insecurity due to a vicious cycle of climatic and natural disasters that have systematically undermined agricultural cereal production and weakened the income base associated with the agro-pastoral lifestyle. As a result, child malnutrition has become almost endemic in many of the country's region and has led to the degradation of the nutritional status of the populations and therefore, to the prevalence of nutritional pathologies and the existence of infectious diseases, in particular among children under 5 years old. Thus, 38% of this age group are affected by global malnutrition.¹ Between 40 and 67% of pregnant women are anemic² and 30.9% of the total population have some type of disorder due to lack of iodine. Less than 9% of lactating women practice exclusive breastfeeding and the incidence of low birth weights is estimated between 5 and 12%.

Maternal death is estimated at 747 for 100,000 live births. This high rate is due mostly to high-risk pregnancies (early or close pregnancies), low access to emergency obstetric care, complications related to high arterial blood pressure, and anemia. Infant mortality remains high with 116 deaths per one thousand children under 5 years, of which 53 happen during the first year of birth. Diarrhea remains the main cause of infant mortality and its prevalence is high (18%) among children under five, especially in the 6 to 23 months age group (23%).

Parasitoses, and intestinal parasitosis, in particular, constitute a real health problem, especially in the south and southeast areas of the country. The incidence of bilharzias (schistosomiasis), in general and intestinal bilharzias in particular, is increasing at an alarming rate, especially in the wake of the Senegal River Development project. The infestation rate in some of the areas close to the river is as high as 90% among children under 9 years old³.

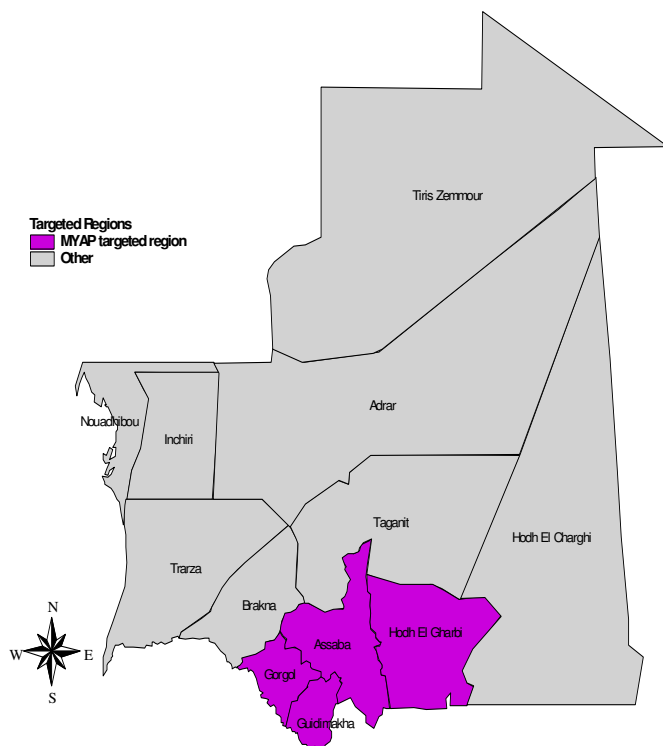
| Acute respiratory infections (ARI) are also a major cause of infant mortality in the country. Despite a 17% incidence among the 6 to 11 months age group and the necessity for an early medical treatment, ARI are not, however, well monitored medically. Only 39% of under five years ARI positive children have been consulted by a qualified health personnel and been treated⁴.

1

2 Enquêtes Anémie, 2000 et 2004.

3 Politique Nationale de santé et d'Action Sociale, Septembre 2004.

4 Enquête VIH chez les femmes enceintes, 2004



Counterpart International requests 57,120 MT in commodities (both monetization and direct distribution) to implement a 5-year Title II MYAP targeting community capacity building to strengthen resilience to shocks. The program will focus on four southern regions – Gorgol, Guidimakha, Assaba and Hodh El Gharbi – and will consist of the following Strategic Objective and three Intermediate Results:

SO 1: Strengthen Human Capabilities in Health, Nutrition, and the Mitigation of the Effects of Food Insecurity

IR 1.1: Improved caretaker practices in health, nutrition, hygiene

IR 1.2: Improved individual and household level livelihood capacities

IR 1.3: Increased capacity of communities to mitigate their food insecurity

1.2 Description of Activities

IR.1.1. A. MOH Participatory Analysis and Strategic Planning: CPI will conduct a strategic planning workshop to identify community-specific objectives, resources (human, financial and physical), and implementation strategies. This process will build a clear understanding of the roles and responsibilities of all stakeholders (MOH personnel, Community Health Workers, Community Health Committees, as well as traditional healers, local NGOs, and religious leaders).

Through a participatory non-formal training approach, CPI will also select individuals from different

segments of the community to participate in a community awareness raising exercise called the Participatory Awareness Raising Training (PART). Over a period of six weeks, participants will explore a range of issues such as “Who am I? and What role do I play in my community?”, “What are my values and responsibilities to my family? My Community? My Country?” The curriculum will be developed to address the needs of the community (*IR.1.3.A.*).

Training Programs: CPI will train GOM health center personnel (Community Health Nurses) as Master Trainers who will in turn train Community Health Workers (CHWs), in GMP. Health Center personnel will also receive refresher courses over the life of the program. CPI will also train local facilitators and TBA to carry out activities at the community level. Community Health Committees will be trained in organizational, administrative and financial management.

CPI will also offer training courses to selected micro-finance institutions serving the target communities. Potential training topics may include: portfolio assessment and monitoring, business counseling, community sensitization, and financial controls (*IR.1.2.B.*). Local Facilitators will be selected from the community and will be trained by the project in participatory training techniques (*IR.1.3.A.*). CPI will also conduct a training of trainers to train local facilitators (*IR.1.3.A.*) and will conduct the PART training. Counterpart will provide training in livestock management, including healthcare, and improved pasture management. The program will also train para-vets (equivalent to community health workers) to become a local resource to livestock owners. As well, the program will offer livestock training on a periodic basis in the urban centers for pastoralist from rural areas (*IR.1.2D*).

IR.1.1 A. Provision of equipment: Nutritional Recuperative Centers (CRENs) will receive support in the form of equipment in order to accommodate the increased level of referrals resulting from the community MCHN programs. They will be provided with basic medical items such as scales, measuring boards, administrative materials such as registers and monitoring and evaluation tools.

IR.1.1.B. Community Sensitization and Community Health Worker Selection: CPI will conduct an effective community sensitization around the program objectives and criteria of illegibility of the target areas to ensure that participating communities understand that this program is focused on development assistance rather than emergency assistance and that it was designed for them.

IR.1.1.C. Growth Monitoring & Promotion (GMP) & Nutritional Surveillance: CPI will establish Community GMP programs in 160 villages. These programs will focus on prevention of and recovery from mild and moderate malnutrition, with a referral system for severe cases to specialized health units, and will target specifically children between the ages of 6 – 36 months. This period represents the weaning period and time when children are most likely to become malnourished.

IR.1.1.C.Food Ration: Following FANTA recommendations for preventive MCHN programming, family sized take-home dry rations will be provided for households of malnourished children younger than months and/or pregnant and lactating women (monthly dry ration is 10 kg lentils, 2 liters of vegetable oil, and 12.5 kg wheat soy-blend).

IR.1.1D. De-worming & Micronutrient Supplementation: CPI, through private donations, will distribute vitamin A to children age 9-59 months and iron supplements to all pregnant and

lactating women during the growth monitoring and promotion sessions. In addition, CPI will also undertake Deworming campaigns every 6 months and will provide praziquantel to persons affected by biliarziosis in the intervention areas.

IR.1.1.E. Promoting Positive Behavior Change – the Hearth Positive Deviance Model: CPI will approach this critical element both at the MCHN level and the community level. Drawing on the Hearth Model, CPI will conduct participatory group sessions during weighing days to discuss success stories from caregivers who have kept their child at a healthy weight. Additionally, CPI will conduct health talks and mass mobilizations to reinforce the activities in the Hearth Positive Deviance Model.

IR.1.1.F. Food-For-Service: CHWs will receive a food as compensation for their on-going service to the program⁵ for their work in program activities and trainings.⁶ CPI experience, as well as other NGOs' in Mauritania, confirm that the time required from CHWs is significant and the normal family ration is not adequate to compensate the CHWs for their time devoted to the program. Providing graduated rations allows CHWs to have first hand experience in preparation of the commodities and ways to adapt the commodities to local taste preferences

Local Facilitators will also be provided food for their time and energy commitment to the program. This compensation is designed to promote consistency and commitment to the program. Like the CHW, they will be also given a graduated family ration each month (***IR.1.3.D.***).

IR.1.2.A. Micro-Finance Training Needs Assessment and Training Plan: CPI will assess the strengths and weaknesses of existing micro-finance institutions in the target regions and determine the demand for and availability of micro-credit at the community level.

IR.1.2.C. Micro Credit Support Fund: In order to ensure funds are available to support individual and group income generation activities, AMPAC will provide a special fund to promote income generating projects that will assist in increasing beneficiary access to start up capital. This funding facility (\$100,000 total) will support sustainability efforts such as promoting Community Health Workers (CHWs) or an Association of Community Health Workers to identify different income generating modalities, including village pharmacies and fee-for-service.

IR.1.2.D. Provide Livestock Services through PCAs: Counterpart will work with its partner ACORD to provide livestock services through Pastoral Cooperative Associations (PCAs) and local governments that include training in livestock management, including healthcare, and improved pasture management. The program will also train para-vets (equivalent to community health workers) to become a local resource to livestock owners. As well, the program will offer livestock training on a periodic basis in the urban centers for pastoralist from rural areas, thereby extending the benefits of this activity.

⁵ Graduated ration for food for service equals 30kg of lentils, 6 liters of vegetable oil, 37.5 kg a month of wheat soy blend.

⁶ IR-1.2 will look for ways to make the Association of Community Health Workers sustainable through different income-generating modalities, including possibly village pharmacies and fee-for-service.

IR.1.3.B. Community Needs Assessment and Action Plan: The PART exercise will serve as the foundation for mobilizing the community to enter into the next stage, the Community Analysis and Needs Assessment (CANA). Conducted by the community itself, this assessment will be carried out with the support and supervision of the Local Facilitator and project supervisors. During the community analysis, communities will identify their resources, needs, opportunities, and set priorities. The outcome of the CANA process will be a Community Action Plan (CAP). The CAP will then serve as a focal point for community action. Community Actions may involve the following areas:

- Reforestation Activities
- Well digging Activities
- Pesticide-free Vegetable Gardening Activities
- Latrine Rehabilitation or Improvement Activities
- Waste Collection Activities
- Animal Fattening Activities
- Infrastructure Rehabilitation Activities (e.g. Health Infrastructures)
- Health IEC campaigns

IR.1.3.C. Support community to access financial/material support for development efforts: Training in project design, proposal development, and financial management will be provided to communities that successfully complete the PART, CANA, CAP, and two community-based activities. This will serve as an incentive to encourage communities to take action to improve the health of their community and to promote a stronger livelihood base. Potential activities may include vegetable gardening, animal fattening activities, chicken raising activities, small trade, sale of local art, creation of rural pharmacies, and so on).

IR.1.3.E. Improvement of Community Infrastructure to Support Improved Food Security: A small grant fund will also be made available to facilitate the funding process for participating communities. The grant fund, the Small Grant Leveraging Fund (SGLF) will be limited to approximately US\$5,000 maximum per activity. This limit serves two purposes: 1) to ensure available funding for several projects, and 2) to promote leveraging with other projects. Activities may include the rehabilitation or construction of household latrines, fee-based waste collection and management activities, rehabilitation of health centers, well digging, clean water processing activities, vegetable gardening, animal fattening, and so on.

1.3 Purpose and Scope of the IEE

The purpose of this IEE is to review the reasonably foreseeable effects on the environment of the on-going and proposed activities for the Mauritania MYAP. This document presents the background of each activity, potential side effects, and mitigation measures. This information will then be used to recommend threshold decisions in accordance with Regulation 216.⁷

⁷ Adherence to the procedures in this IEE is not in lieu of any environmental assessment procedures required under

2.0 COUNTRY AND ENVIRONMENTAL INFORMATION (BASELINE INFORMATION)

2.1 Locations Affected

Situated in the northwestern part of the Sahara desert and covering an area of 1, 030, 700 km², Mauritania is strategically placed between north Africa and Subsaharan Africa and constitutes a buffer between the two regions, both in geographic and ethnic terms. The country is bordered in the north by Morocco and Algeria, in the east by Mali, in the south by Senegal, and by the Atlantic Ocean in the West.

The Maures (of Arab or Berber descent) and their black slaves, the Haratines, mostly present in the northern and central and eastern parts of the country, live along side the southern and south eastern black populations of Peuls, Soninke, Wolof , Bambara and haratines. However, ethnic and cultural tensions, mostly a result of post independence politics and geopolitical positioning of the various governments that came to power through military coups, have put a serious dent on the national unity and have turned the black populations into almost citizens of second class.

With a total population estimated at around 3,000,000 people, Mauritania is a food insecure country and relies heavily on imports and donations to meet its cereal needs. In a normal year Mauritania produces only 27% of its cereal needs, however, even these estimates are often compromised by the frequent actions of agricultural predators such as birds. In addition, the lack of clear land tenure and range management policies results often in harvests being destroyed by wandering cattle and camels and thus exacerbating the ethnic tensions between the black (mostly farmers) and the Arab population (mostly nomads and camels owners). Furthermore, the irregularity of rainfall and its insufficient nature contribute to making agricultural production deficit a structural problem in the country.

The proposed intervention areas are situated in the southern and central parts of the country and constitute some of the few regions where agriculture is still possible in the country. However, the slow but inexorable creeping of the desert southward and the reduction in the flood recession agricultural land due to the construction of the Diama dam, combined with the climatic realities referred to above, have coalesced to weaken even more the livelihood system of the populations in these regions. Mostly farmers and animal breeders, the inhabitants of Gorgol, Guidimaka Assaba and Hod El Gharbi rely heavily on the whimsical nature of the climate for their sustenance. Their coping strategies to the relentless assault of nature have consisted in reducing meals, selling assets, migrating seasonally (transhumance, rural exodus).

The most affected by these harsh conditions are naturally women and children. Child malnutrition has reached an alarming rate and in certain parts of the target regions, such as Leftout, it has become endemic. According to the VAM survey conducted in 2005, 44,2% of

Mauritanian law, nor can adherence to Mauritania's environmental procedures be substituted for compliance with the procedures in the approved IEE. Notwithstanding, efforts will be made to ensure compatibility between the two respective assessment information requirements.

surveyed households were food insecure, 11,1% of which is severe. These households are usually located in the South-East, Aftout and the Senegal River Valley (VAM 2005, p.35).

The VAM also reported the highest level of food insecurity in the South east, where 22,9% of households surveyed were considered “very vulnerable” to food insecurity. The households at moderate or high risk of food insecurity represented 61,1%, the highest of any zone surveyed. The VAM notes that 72,9% of households in this area live on less than 0,6 \$ US per day per household and use 75% of their income on food. In case of shock, households usually must borrow money and reduce the quality and quantity of food. Most households are composed of 9 people and headed by widowed or divorced women with little formal education (VAM 2005, p.34).

The analysis of the nutritional status of children less than 5 years shows degradation in the South east, Affolé and river valley, where the prevalence of acute malnutrition is superior to the critical level at 15% fixed by the WHO. The nutritional situation in this part of Mauritania requires a immediate intervention to stop the degradation of food conditions of the local population and nutrition of children less than 5 years of age (VAM 2005, p.36).

2.2 Environmental Policies and Procedures

According to environmental guidelines issued by the Mauritanian Environmental Protection Agency, all activities proposed in this MYAP which are all considered small in scale, do not require the submission of any environmental impact assessment report. Potential community-initiated activities resulting from the CANA and PART exercises may, however, require environmental assessments according to their categories. CPI will make the determination prior to funding or supporting any activity with potential negative environmental impact. In case an EIA is warranted, CPI will submit an amended IEE. Adherence to the procedures in this IEE is not in lieu of any environmental assessment procedures required under Mauritanian law, nor can adherence to Mauritania’s environmental procedures be substituted for compliance with the procedures in this IEE. However, efforts will be made to ensure a maximum degree of compatibility of the two respective assessment information requirements.

2.2.1 Background:

Due the fragile nature of its environment, the Government of Mauritania attaches great importance in the protection and conservation of its natural resources. Thus, it has signed many agreements and ratified international conventions, such as the Convention to Combat Desertification (CCD) and the Convention on Biodiversity. While CPI expects that its proposed activities and the community’s potential activities will be of small scale and will not have significant negative impact on the environment, it will, however, ensure that all the activities carried out within the MYAP program will comply with the Mauritanian environmental laws and the guidelines set by FFP.

CPI will use the Mauritanian Environment Code as a guiding principle prior to implementing any activity with potential negative impact on the environment. The Environment Code (*Code de l’Environnement* 2000-045) was voted to enhance Mauritania’s ability to protect its natural

resources, atmosphere, water, and soils through a set of well defined measures to be enforced at the national level. One of these measures stipulates that Environmental Impact Assessments be conducted for all activities with potential negative impact on the environment. The November 2004 Environmental Impact Assessment Decree (*Decree no 200-094* relative to Environmental Impact Studies) sorts out activities into three categories according to their potential impact on the environment. Category A activities require environmental impact assessments, Category B requires only notification of the Ministry of Rural Development and the Environment or the mayor (article 4), whereas Category C activities require neither notification nor environmental assessments. In implementing its activities, CPI will determine which categories apply and will comply accordingly.

CPI potential community-initiated activities such as Reforestation activities will be carried following the Mauritanian Plant Protection Law (*law no 042/2000 relative to plant protection*) which defines importation conditions and types of plants and plant products into Mauritania. CPI will ensure that all plants for reforestation are cleared by the Mauritanian Plant Protection Services and do not constitute a threat to the environment (article 5).

Potential activities, such as well digging, latrine construction, rehabilitation or improvement and waste collection will be carried out in strict compliance with Mauritania's Water Code (*Code de l'eau 2000-030*) which seeks to protect water quality in the country and to ensure that it is available to the largest population possible and shared equitably (article 3). Well digging for drinking water will conform to the country's accepted potability standards (article 34). CPI will also ensure that Latrine construction, rehabilitation or improvement as well as waste collection activities do not affect the quality of the different sources of potable water. CPI will seek the expertise and work closely with the Mauritanian Hydraulics Department in implementing potential well digging, latrine construction, rehabilitation or improvement or waste collection activities to make sure that compliance to the Water Code is strictly observed.

3.0 EVALUATION OF POTENTIAL ENVIRONMENTAL IMPACTS OF ACTIVITY/PROGRAM

The activities proposed for this MYAP fall under the following major categories: monetization and program operations, strengthening human capabilities in health, nutrition and mitigation of effects of food insecurity, access to food through livelihood enhancement, building community awareness and mobilization for action.

Monetization of Title II commodities, monitoring and evaluation, and office and personnel expenses are not expected to have any negative impact on the environment. Monetization will be done through existing private sector operators including transportation and storage facilities and infrastructures. Monetized commodities will be transferred directly to the buyer's possession at the port and will not be stored by CPI. Therefore no fumigation will be needed and no impact on the environment is expected from this intervention. Therefore it qualifies for categorical exclusion (Reg. 216.2 (c) (1) (i) for environmental review.

Strengthening human capabilities in health, nutrition: the activities proposed under this heading involve training GOM health personnel, CHW, TBA to improve health and nutrition condition in the target regions. Therefore, these training are not expected to have any negative environmental impact.

Improving health and nutrition involves decreasing malnutrition through distribution of monthly food rations, childhood growth monitoring, and caregiver training in feeding and hygiene practices, and nutritional training with community health workers. All of these activities are focused on training, information dissemination, monitoring, and distribution of food, and as such, will not provoke adverse environmental impacts. ***Provision of deworming and Bilatziosis medications*** has the potential to increase the release of parasites into the environment; therefore an information campaign will inform beneficiaries of the need to use proper sanitation facilities to mitigate the impact.

The cooking of the commodities provided by CPI through its MCHN program may have a potential negative effect on the environment as fuel wood would be required. CPI will take the following actions to mitigate the impact:

- 1) Sensitize the target populations on the need for an efficient use of the fuel and the proper and most efficient way to cook the commodities.
- 2) Encourage the use of improved low energy stoves
- 3) Encourage the use of gas stove (gas stoves are already subsidized by GOM to encourage their wider use)
- 4) Encourage reforestation in the communities
- 5) Use of gas stoves for all CPI-sponsored wet meals and culinary demonstrations

Increasing individual and household-level livelihood capacities: involves developing a training plan for micro-credit institutions, conducting training for micro-credit personnel, and the provision of loan funds for the institutions. The loan funds are expected to satisfy credit needs for small trade activities, pesticide-free vegetable gardening, animal fattening activities, art craft development, all of which have little or no significant impact on the environment and are of a small scale. Therefore, no negative environmental impact is expected from the

implementation of these activities.

Building community awareness and mobilization for action: involves conducting Participatory Awareness Raising Training (PART), Community Analysis and Needs Assessment (CANA) and developing Community Action Plans (CAP), supporting community to access financial/material support for development efforts, providing Food-for-Service for Local Facilitators, improving Community Infrastructure to support Improved Food Security through the provision of small grants to fund community-initiated activities (part of deferral activities). All these activities are not expected to have any negative impact on the environment.

1. RECOMMENDED TRESHOLD DECISIONS AND MITIGATION ACTIONS (INCLUDING MONITORING AND EVALUATION)

1.1 Recommended IEE determination

All activities proposed fall under either a categorical exclusion or a negative determination with conditions.

1.1.1. Monetization. A Categorical Exclusion under 22 CFR 216.2 (c)(1)(i) is recommended for the monetization since CPI will transfer the commodities directly to the buyer at the port and will neither store or fumigate them.

1.1.2. Direct distribution of agricultural commodities. A Negative Determination with conditions is recommended because this activity involves fumigation (A PERSUAP will be submitted prior to carrying out any fumigation activity).

1.1.3. Training. Sensitizations and training programs and workshops qualify for a **categorical exclusion** under 22 CFR 216.2(c)(2)(i)

1.1.3.1. Training of Community Health Workers and MOH personnel, TBA in *maternal-child health and nutrition; growth monitoring and promotion; de-worming and micronutrient supplementation* are not expected to have a direct impact on the environment. Therefore, CPI recommends for this specific activity a **categorical exclusion** under 22 CFR 216.2(c)(2)(i).

1.1.3.2. Training of TOT, local facilitators in *community mobilization (PART, CANA, CAP)* is not expected to have a direct impact on the environment. Therefore, CPI recommends for this specific activity a **categorical exclusion** under 22 CFR 216.2(c)(2)(i).

1.1.3.3. Training of Micro-credit institutions and their personnel in portfolio assessment & monitoring, business counseling, client marketing, community sensitization and in recognition of sound business plan. No negative environmental impact is

expected from the implementation of these activities. Therefore, CPI recommends for this specific activity a **categorical exclusion** under 22 CFR 216.2(c)(2)(i).

- 1.1.3.4. Training in livestock management, including healthcare, and improved pasture management; training of para-vets are not expected to have negative impact on the environment. Therefore, CPI recommends for this specific activity a **categorical exclusion** under 22 CFR 216.2(c)(2)(i).

1.1.4. Supply of equipment. CPI will supply small equipment to the CRENs, the CHW and the TBAs to improve their work conditions and ensure data quality. The equipment that will be provided include, scales, measuring board, management tools. CPI does not expect any negative environmental impact deriving from the provision of these items. Therefore, CPI recommends for this specific activity a **categorical exclusion** under 22 CFR 216.2(c)(2)(i).

1.1.5. Food Distribution: CPI will be providing food (WSB, Lentils, Oil) to beneficiaries in its MCHN programs, as well as to the CHW, TBA, local facilitators. These commodities will be shipped from the US and stored in warehouses throughout the intervention zone. Storing these commodities may have some environmental impact as fumigation and other measures may be necessary to protect the stocks. Therefore, there is a potential for a negative environmental impact. Consequently, CPI recommends a **negative determination with conditions** for this activity under 22 CFR 216.3(a)(2)(iii). A PERSUAP will be submitted prior to the start of the fumigation activities. Additionally, the cooking of the commodities provided by CPI may have a negative impact on the environment as fuel wood is widely used in the intervention area. In order to avoid the overexploitation of scarce forest resources through fuel wood use, CPI will take the following mitigation measures:

- 1) Sensitize the target populations on the need for an efficient use of the fuel and the proper and most efficient way to cook the commodities.
- 2) Encourage the use of improved low energy stoves
- 3) Encourage the use of gas stove (gas stoves are already subsidized by GOM to encourage their wider use)
- 4) Encourage reforestation in the communities
- 5) Use of gas stoves for all CPI-sponsored wet meals and culinary demonstrations

1.2 Mitigation, Monitoring and Evaluation

CPI is responsible for regular monitoring of activities that affect the environment and will thus use various means of ensuring that proper procedures are implemented. An environmental monitoring, evaluation, and mitigation process will be established and used by the implementing partners in collaboration with USAID. USAID-supported activities shall incorporate appropriate mitigation and monitoring procedures as listed

below:

- CPI will use the *Environmental Guidelines for Small-Scale Activities in Africa*, or other appropriate references, to assist in determining what potential impacts should be of concern for different types of development activities in various settings. Using the information from this and other documents therein, CPI will determine which impacts to mitigate and monitor for the particular development activity.
- CPI will identify in the Environmental Review Reports all proposed environmental mitigation and monitoring requirements.
- Once the Environmental Review Reports are approved, the mitigation measures and monitoring procedures stated therein shall be considered a requirement.
- CPI, with assistance of other appropriate partners, shall be responsible for implementation of agreed-on mitigation measures and monitoring of impacts.
- All CPI periodic reports to West Africa Regional Mission under these procedures shall contain a section on environmental impacts, success or failure of mitigation measures being implemented, results of environmental monitoring, and any major modifications/revisions to the project, mitigation measures or monitoring procedures.

West Africa regional Mission is responsible for reviewing and approving necessary documentation provided by CPI. In particular, the Mission will undertake the following:

- Review of CPI reports with respect to results of environmental mitigation and monitoring procedures;
- Incorporation into Mission field visits and consultations with CPI the periodic examination of environmental impacts, and associated mitigation and monitoring activities (assistance in preparing guidelines or with the monitoring and evaluation can be solicited from the BEO); and
- Reporting on implementation of mitigation and monitoring requirements, as part of the summary of activities and their status that is passed to the BEO.

The table below summarizes the preceding discussion and the proposed mitigation measures and monitoring plan.

Table 1. Summary of CPI Activities, Scale, Potential Environmental Impacts, Probable determinations and Proposed Mitigation measures

Activities	Scale	Potential Environmental Impacts	Probable Determinations	Proposed Mitigation measures	Monitoring (Indicators, frequency, Responsibility)
Monetization		None (commodities will be transferred directly to buyer)	Categorical Exclusion per 22 CFR 216.2 (c)(1)(i)		
Direct distribution of agricultural commodities	54,504	Potential exists Over-exploitation of fuel wood	Neg. Det with conditions under 22 CFR 216.3(a)(2)(iii)	PERSUAP will be developed for pesticides and safe utilization plan. To avoid overexploitation of fuel wood, the following measures will be taken: 1) Sensitize the target populations on the need for an efficient use of the fuel and the proper and most efficient way to cook the commodities. 2) Encourage the use of improved low energy stoves 3) Encourage the use of gas stove (subsidized by GOM to encourage their use) 4) Encourage reforestation in the communities 5) Use of gas stoves for all CPI-sponsored wet meals and culinary demonstrations	Number of warehouses with no food infestations; Number of warehouse inspection by professional DPV inspectors; Technical Advisor and the Crop Protection Services Senior Inspector; CPI Staff
Training in MCHN;	600 CHWs	None	Categorical exclusion per		No. children enrolled in

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GMP; de-worming & MN;			22 CRF 216.2 (c)(2)(i)		GMP in the past 3 months Responsible: health director, field supervisors, CHW, TBA
Training in PART	TBD	None	Categorical exclusion per 22 CRF 216.2 (c)(2)(i)		Number of training sessions conducted Source: training reports Responsible: field supervisors
Training in CANA	TBD	None	Categorical exclusion per 22 CRF 216.2 (c)(2)(i)		Number of training sessions conducted Source: training reports Responsible: field supervisors
Training in CAP	TBD	None since these are classroom type of exercises (brainstorming) to come up with Action plans to be implemented	Categorical exclusion per 22 CRF 216.2 (c)(2)(i)		Number of communities trained in CAP Source: training reports Responsible: field supervisors
Training of Micro-credit Institutions	TBD	None	Categorical exclusion per 22 CRF 216.2 (c)(2)(i)		Number of micro-credit institutions trained Source: training reports Responsible: field supervisors
Training of micro-credit personnel	TBD	none	Categorical exclusion per 22 CRF 216.2 (c)(2)(i)		Number of micro-credit personnel trained Source: training reports Responsible: field supervisors
Training in livestock Services	TBD	None	Categorical exclusion per 22 CRF 216.2 (c)(2)(i)		1) Number of para-vets trained; 2) Number of PCA receiving assistance; 3) % of immunized livestock; Source: training reports;

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					survey questionnaires. Responsible: Field supervisors, M&E
Supply of equipment	TBD	none	Categorical exclusion per 22 CFR 216.2 (c)(2)(i)		1)Number of Health units provided with equipment 2) number of CHW provided with equipment 3) number of TBA provided with equipment Source: administrative and financial records. Responsible: field supervisor& program manager.

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5. Summary of Findings:

Based on environmental review procedures, the following environmental determinations are recommended:

1. A **Categorical Exclusion** is recommended for all training activities under 22 CFR 216.2(c)(2)(i), for which no further screening and review shall be necessary. The training are of classroom type and do not involve any chemicals or products that might have a negative impact on the environment. Therefore the activity shall be categorically excluded from further environmental review.

2. A **Negative Determination with Conditions** is recommended for the food distribution component. This activity will use fumigant gas and other pesticides for the preservation of the commodities. The condition, therefore, is that a PERSUAP (Pesticide Use Report and Safe Action Plan) be prepared and approved before this activity is initiated.

3. A **Categorical Exclusion** is recommended for all the activities related to the supply of equipment to health units, TBAs, and CHW under 22 CFR 216.2(c)(2)(i), for which no further screening and review shall be necessary. This equipment is standard and its operation does not produce any negative impact on the environment. Therefore the activity shall be categorically excluded from further environmental review.

6. A **Deferral** is requested for activities that will be identified by the communities and that might have a negative impact on the environment. In the case of such an eventuality, CPI will work with the communities to identify and implement mitigation measures for these activities. It is expected that these activities will be of a small scale and CPI will use recommended mitigation measures contained in **Guidelines for Small Scale Activities in Africa**.

List of potential activities for deferral.

- Reforestation Activities
- Well digging Activities
- Pesticide-free Vegetable Gardening Activities
- Latrine Rehabilitation or Improvement Activities
- Waste Collection Activities
- Animal Fattening Activities
- Infrastructure Rehabilitation Activities (e.g. Health Infrastructures)
- Health IEC campaigns

This IEE specifies a set of steps to ensure adequate environmental review of USAID-supported activities, including capacity-building elements. These negative determinations are also conditioned on the provision of supplemental project technical assistance and training support to augment existing efforts. These capacities will be developed and implemented in close collaboration with USAID/Senegal.

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